

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC.  
Plaintiff,**

**v.**

**EVAN P. JOWERS, YULIYA  
VINOKUROVA, ALEJANDRO VARGAS,  
and LEGIS VENTURES (HK) COMPANY  
LIMITED (aka Jowers / Vargas),  
Defendants.**

**Civil Action No. 1:18-cv-00444**

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**EVAN P. JOWERS**

**Counterclaimant,**

**v.**

**MWK RECRUITING, INC., ROBERT E.  
KINNEY, MICHELLE W. KINNEY,  
RECRUITING PARTNERS GP, INC.,  
KINNEY RECRUITING LLC, COUNSEL  
UNLIMITED LLC, and KINNEY  
RECRUITING LIMITED**

**Counter-defendants.**

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**MOTION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that pursuant to Local Rule AT-3, Robert Tauler, Esq. (“Tauler”) and Tauler Smith LLP, counsel for Defendant/Counterclaimant Evan P. Jowers (“Jowers”), move to withdraw as counsel of record for Jowers.

Tauler seeks to withdraw as counsel of record because a fundamental disagreement has arisen between client and attorney with respect to the terms of the parties’ agreement relating to the representation. Tex. Disciplinary R. Prof. Conduct, 1.15(b)(5).

Jowers’ successor attorney is not yet known. Jower’s last known address is as follows:

Evan P. Jowers  
612 Hibiscus Drive  
Hallandale Beach, FL 33009  
(917) 292-8657

Jowers is aware that this Motion for Withdrawal is being submitted and consents to its filing, as confirmed by his signature on the line below.

DocuSigned by:  
  
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Evan P. Jowers

Dated: November 14, 2023

Respectfully submitted,

By: /s/ Robert Tauler  
Robert Tauler, Esq.  
State Bar No. 24122095  
[rtauler@taulersmith.com](mailto:rtauler@taulersmith.com)  
**Tauler Smith LLP**  
100 Crescent Court, 7<sup>th</sup> Floor  
Dallas, TX 75201  
Telephone: (512) 456-8760

**COUNSEL FOR DEFENDANT  
AND COUNTERCLAIMANT  
EVAN P. JOWERS**

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 14, 2023, a true and accurate copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Robert Tauler  
Robert Tauler